



In the United States Patent and Trademark Office

Serial Number: 10/053,851
Application Filed: 10/25/2001
Applicants: Wolf-Dieter R. Berndt and Ronnell R. Runyon
Application Title: Dry Cleaning Business Model Algorithm
Examiner:

4/129103

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2790 Wronde Way, PMB36
Reno, NV 89502

(702) 826-3447

April 28, 2003

Assistant Commissioner for Patents
Washington, D.C. 20231

I certify that this correspondence which consists of Petition to Make Special and Declaration in Support of Petition to Make Special are being placed in Express Mail, Express Mail Number EU6648417720US on April 28, 2003 at Reno, Nevada addressed to Assistant Commissioner for Patents, Washington, D.C. 20231 for the purpose of securing the filing date of April 28, 2003.

Respectfully,

Herbert C. Schulze



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Petition to Make Special


Assistant Commissioner for Patents
Washington, D.C. 20231

Dear Sir,

The above named applicants respectfully petition that the above identified application be made special under the provisions of 37 CFR 1.102 (d) [MPEP Section 708.02] for the reason that Infringement exists. Attached is Declaration of Attorney in support of this petition

Petition fee in the amount of \$ 130.00 or other appropriate amount is to be charged. to deposit account 19-0720.

Respectfully,



Herbert C. Schulze

05/02/2003 CNGUYEN 00000002 190720 10053851

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572B

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Reno, NV 89502

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Declaration in Support of Petition to Make Special

Assistant Commissioner for Patents
Washington, D.C. 20231

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Dear Sir,

Herbert C. Schulze declares as follows:

I am an attorney admitted to practice law in the State of California. I am registered to practice before the United States Patent and Trademark Office, Registration Number 18,173. I am the Attorney of Record in this matter pending before the United States Patent and Trademark Office.

The present invention is a Business Model Algorithm Application involving the conversion of Dry Cleaning Machinery from operation with Perchloroethylene solvent and other solvents which are in disfavor now due to their environmentally destructive nature, to enable the machinery to be used with Organo Silicone-Based solvents, which are environmentally friendly.

The present Patent Application has three claims pending. The claims are as follows:

"1. The dry cleaning business model algorithm comprising the steps of: A dry cleaning facility

receives from a customer, and inspects, material to be dry cleaned; the material suitable for dry cleaning is placed into dry cleaning equipment which has been converted from use with a non-silicone based cleaning solvent to use with a silicone based cleaning solvent; the equipment is run through a cleaning cycle which includes contact of the material being cleaned with silicone based solvent, filtration of the silicone based cleaning solvent while the cleaning cycle runs, and separation of water from the silicone based solvent while the cleaning cycle runs; at the conclusion of the cleaning cycle the material which has been in the converted dry cleaning equipment is removed and treated as necessary (lint removal, pressing, etc. as will be known to those skilled in the art; and , finally the now dry cleaned material is returned to the customer.

2. The dry cleaning equipment conversion from perc or pet solvents to the use of sil-solve solvents business model algorithm comprising the steps of : preparation of equipment for conversion; installation and connection of filter assembly and filters in association with the equipment ; installation of water separator in association with the equipment; installation of temperature sensor in association with the equipment; and installation of steam valve.

3. A method for converting dry cleaning machinery previously designed for use with various solvents other than silicone based solvents so that the machinery can operate properly using silicone based solvents comprising: installing filter means in association with the machinery, installing water separator means in association with the machinery; and installing temperature sensing means in association with the machinery.”

Attached Exhibit 1 is one sheet from advertising material concerning my clients’ invention.

I have not seen an alleged infringing operation, but I have seen an advertising brochure for such system. A copy of that brochure is attached as Exhibit 2. Upon examination of Exhibits 1 and 2, it is my opinion that the diagram at the bottom of the second page of Exhibit 2 has been directly

copied from my clients' Exhibit 1. It is my opinion that this diagram (Exhibit 1) tells the basic story of the present invention and the diagram at the bottom of page 2 of Exhibit 2 (the alleged infringing system) is virtually identical to, and appears to have been substantially copied from Exhibit 1.

I have conducted a search utilizing the United States Patent and Trademark Office Internet Website. I have found nothing which I consider to anticipate nor suggest the present invention as disclosed and claimed in the above entitled Application.

It is my opinion that the system as shown and described in the attached Exhibit 2 is an infringement on the claims in the above entitled Application:

Claim 1 is a business model algorithm of a complete dry cleaning cycle utilizing converted machinery according to the invention as described in the above entitled application. While claim 1 would, in my opinion, not necessarily be infringed by the mere existence of the system of the attached Exhibit 2, it would amount to contributory infringement when the complete dry cleaning cycle as set forth in claim 1 is performed.

Claim 2 is a business model algorithm involving the actual machinery conversion algorithm. There is one element of claim 2 which is not shown in the alleged infringing system. That element is the installation of a steam valve. I am informed by my clients, who are experts in the field, that it might be possible to operate without steam but that it is unlikely that it would be practical nor effective. Therefore, I believe that there would be infringement under the doctrine of equivalents if the alleged infringing system was operated at all.

Claim 3 is a method for converting dry cleaning machinery which in my opinion would be directly infringed by the alleged infringing device. In this respect it is my opinion that this cannot be contradicted when the diagram on the second page of Exhibit 2 is compared to the diagram shown on Exhibit 1.

I hereby declare that all statements made herein of my own knowledge are true and that all statements made on information and belief or as opinions are believed to be true, and further that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under title 18, United States Code, Section 1001, and that such willful false statements may jeopardize the validity of the above entitled Patent Application or any Patent issued thereon.

Executed on April 28, 2003 at Reno, Nevada.



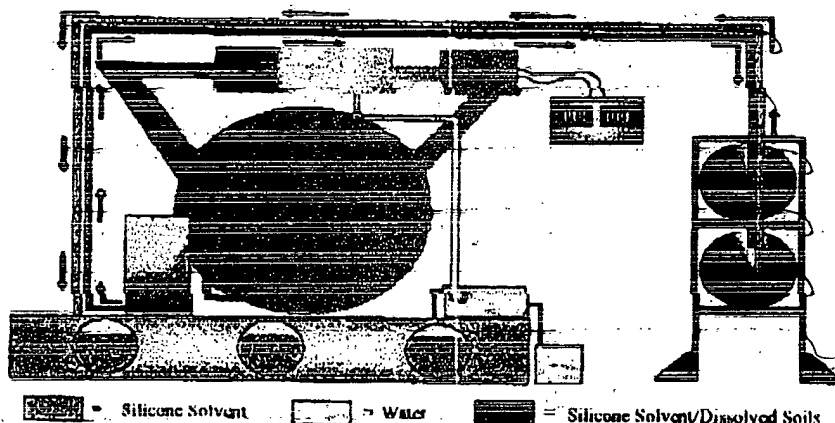
Herbert C. Schulze



The Converttech Solution

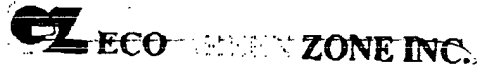
The advantages of converting your machine

- Considerable cost savings over purchasing a "New" machine
(25% of the new machine cost)
- Conversions done by qualified technicians
- No down time -- conversions done during off hours and
machine is operational by next business day
- No machine uninstalling/reinstalling required
- Minimal training required to operate converted machine
(Training includes operating your machine to get the best results
using the silicone based solvent)
- Reduced maintenance of converted machine required including
dramatic reduction of lint



Call Now 1-650-780-9641 for more information!!

EXHIBIT 1
(ONE PAGE)



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Green Conversion

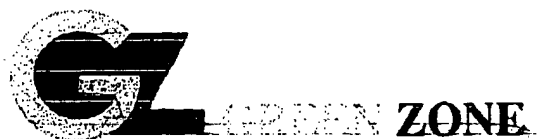
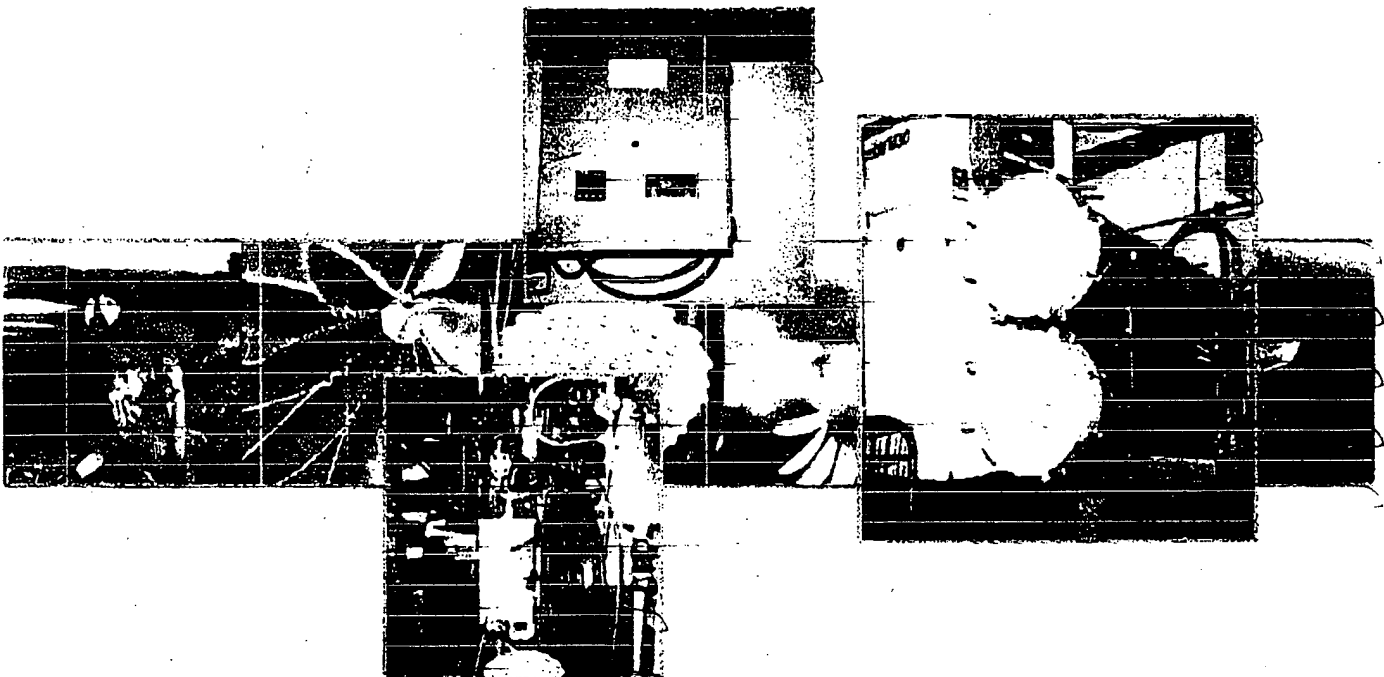
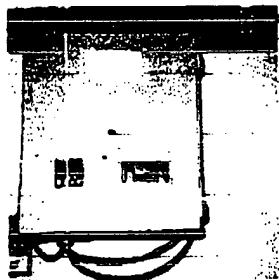


EXHIBIT 2
P. 1 OF 3

1. Temperature Control Box

- 12" X 6" X 10"
- Box will be attached to the side of the dry cleaner.
- It contains two triggers to prevent any danger of Green Earth solvent reaching its flash point.
- With one more trigger existing in the dry cleaner itself, there will be three temperature triggers all together

Current control unit



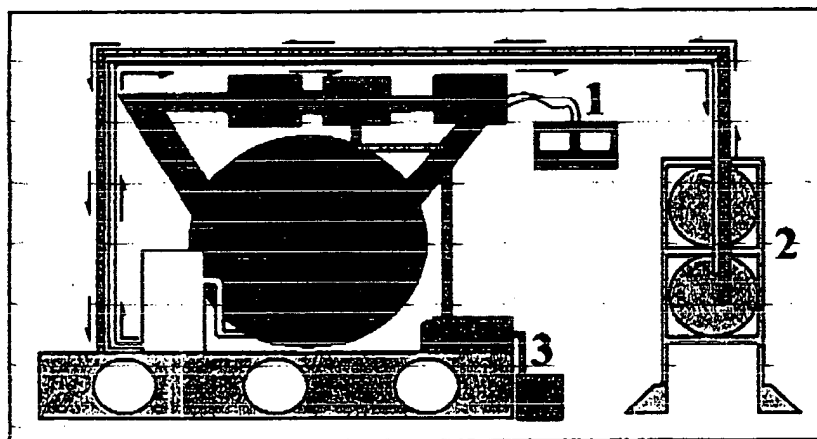
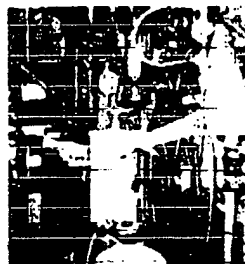
Filtration unit



2. Filtration System

- 15" X 15" X 54" (72")
- System will be installed at either left or the right side of the dry cleaner
- It contains six Green Earth filters to flush out any lint, dirt, and even colors

Water Separator

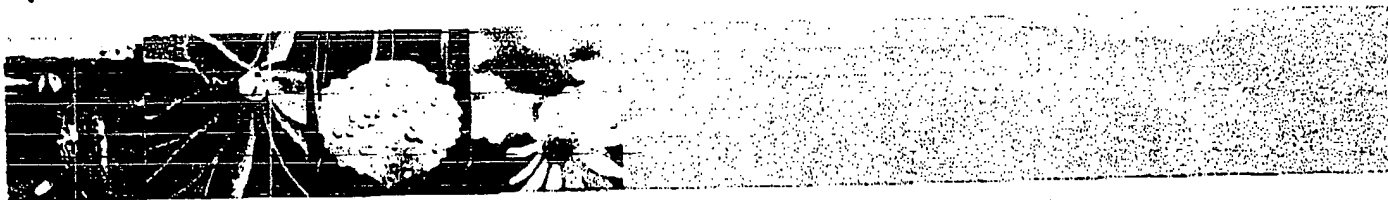


Silicon Solvent
 Water
 Silicon Solvent / Dissolved soils

3. Water Separator

- 12" X 16" X 6"
- Separator will be installed behind the dry cleaner.
- It is used to cool Green Earth solvent and separate any water that could have gotten into Green Earth

EXHIBIT 2
P. 2 of 3



Green Earth is...

A dry cleaning solvent developed by General Electric. Its silicone based properties has been proved to be non-toxic and safe for the environment.

Green Conversion is...

A device used to convert current dry cleaning machines utilizing PERC to use silicone based solvent (Green Earth).

Benefits of using Green Conversion with Green Earth

- The Green Earth solvent produces no odor. Foul odor of PERC will be no more.
- The Green Earth solvent does not shrink or wrinkle fabrics. Unlike the Rynex solvent, our silicone-based solvent does not alter or ruin clothing.
- The Green Conversion device does not require cooking of the solvent. The device will be using six carbon filters, which will filter any dirt, lint, and colors out of the Green Earth solvent.
- Fabrics like leather and suede can be cleaned with the Green Earth solvent. It will not damage or harm any of those fabrics therefore there is no need to drop your fabrics off somewhere else.
- Different colored fabrics can be mixed and cleaned together in the Green Earth solvent saving you the trouble of separating colors.
- The Green Earth solvent is much stronger against food and sweat stains compared to Perc.
- Our installation is a simple process. Our devices are neither heavy nor large and it will only take a day to complete the installation.
- When Green Earth solvent is inserted into the machine, the silicone-based solvent will fill the rusted parts of the PERC machine to extend its life.
- There is familiarity with the use of the Green Conversion device because you will still be using the same controls but on a modified machine. You will have to learn about the Green Earth solvent, but at least it is not a completely different machine with different controls.
- Have you been paying for AQMD permit fees? Those annoyances will be no more since Green Earth is a non-toxic solution and it is not under AQMD jurisdiction. No more permits, no more AQMD.
- Green Conversion with the use of the Green Earth solution will be a big boost financially for your company. Not only do they provide you with marketing materials like t-shirts and free brochures, but Green Zone will also provide a large banner for your store, letting customers know that you are a non-toxic dry cleaner.
- Having trouble with your landlord? Green Conversion is the answer in getting your landlord off your back. Green Earth solution is a non-toxic solution, which means landlords do not have to pay ground insurance to the EPA. Therefore, landlords will not have any problems with your business.
- Most importantly, your employees, your customers, and your community will not be affected by health side effects of PERC. The Green Conversion device with the use of the Green Earth solution is your answer to a cleaner, safer, and more profitable way to run your Dry Cleaning Business.

EXHIBIT 2
P. 3 of 3